

AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.
Gabriel Aliq Scott

Case: 2:20-mj-30026
Judge: Unassigned,
Filed: 01-21-2020
CMP: USA v SCOTT (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 21, 2020 in the county of Washtenaw in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC § 922(g)(1)	Felon in possession of a firearm

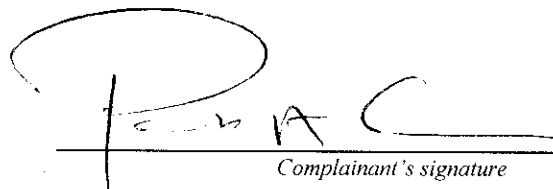
This criminal complaint is based on these facts:
see attached affidavit.

☒ Continued on the attached sheet.

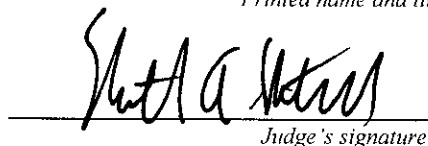
Sworn to before me and signed in my presence.

Date: JAN 21 2020

City and state: Detroit, Michigan


Complainant's signature

Ted A. Crews, Special Agent (ATF)
Printed name and title


Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Ted A. Crews, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been for over 19 years. Previously, I worked as a Criminal Investigator with the Bureau of Indian Affairs (BIA). During my time as a Federal Criminal Investigator, I have participated in numerous investigations that resulted in the execution of federal search and arrest warrants.

2. The information below is provided for the limited purpose of establishing probable cause and does not contain all information known to law enforcement related to this investigation.

II. SUMMARY OF THE INVESTIGATION

3. I am investigating Gabriel Aliq SCOTT (DOB: XX/XX/1998) for being a felon in possession of a firearm, in violation of 18 U.S.C. § 922(g)(1).

4. I queried SCOTT in NCIC and learned that he was convicted of two counts of felony firearms and two counts of carrying a concealed

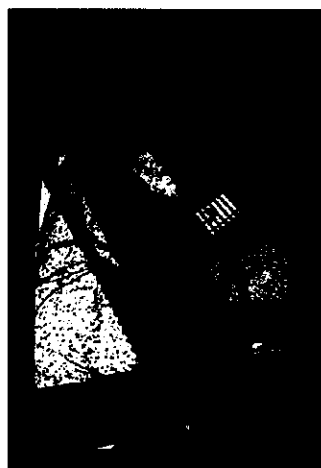
weapon in 2016. It appears that he was sentenced to two years' imprisonment. He was discharged on or about May 16, 2018.

5. SCOTT's Snapchat records were obtained through a state search warrant.

6. On February 16, 2019, a video posted to SCOTT's Snapchat account shows SCOTT with a black colored pistol in his hand.



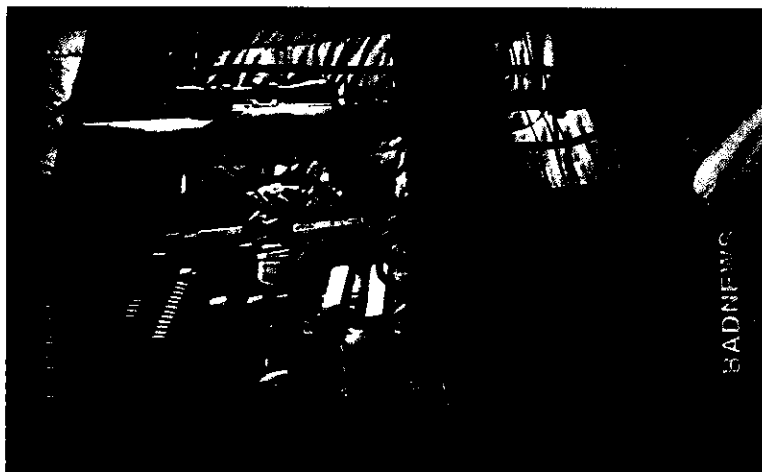
7. On or about February 22, 2019, the below image showing a rifle with a collapsing stock was posted on SCOTT's Snapchat account.



8. On February 23, 2019, an image was posted on SCOTT's Snapchat account that appears to be SCOTT with multiple pistols.



9. On or about June 26, 2019, an image was posted to SCOTT's Snapchat account that shows firearms on a bed. A black rifle with an affixed scope and a black handgun are circled in red. There are also other handguns and magazines. Many magazines appear loaded and the plastic bag appears to contain ammunition.



10. On the evening of September 6, 2019, the Ypsilanti Police Department (YPD) responded to a shooting at or near 1427 LeForge Road, Apartment 126, in Ypsilanti, Michigan (PRIOR RESIDENCE), where SCOTT was then residing.

11. According to YPD, two subjects met with SCOTT at the PRIOR RESIDENCE, shots were fired, and the two subjects fled on foot. When YPD arrived at the PRIOR RESIDENCE, SCOTT was gone. At least one of the two subjects was treated for a gunshot wound at a local hospital shortly after the shooting.

12. YPD's investigation identified SCOTT as the shooter. YPD searched the PRIOR RESIDENCE and seized spent casings, loaded magazines, ammunition, cocaine, and suspected marijuana.

13. No firearms were located in the PRIOR RESIDENCE, but cases for two Glock pistols and a wooden rifle stock were recovered.

14. On September 7, 2019, SCOTT contacted YPD Detective Jessica Lowry by phone and told her that two armed subjects came to his apartment to sell gift cards and assaulted him. SCOTT said that he shot at them in self-defense. SCOTT was reluctant to say more but said he would contact Detective Lowry again.

15. On September 9, 2019, SCOTT called Detective Lowry and again admitted that he shot at the subjects. He would not provide additional information about what was found in the PRIOR RESIDENCE or the firearm used.

16. As a result of the shooting, SCOTT stopped living at the PRIOR RESIDENCE and his exact whereabouts became unknown.

17. A cellular telephone, believed to be SCOTT's, was recovered in the hallway outside the PRIOR RESIDENCE after the shooting and downloaded by YDP pursuant to a state search warrant. The download revealed multiple images and videos clips of SCOTT with firearms on the following dates.

18. March 21, 2019: SCOTT is shown with a wooden stock AK-47. The butt stock is missing and it has a pistol grip. The missing butt stock is similar in appearance to the one seized by YPD from the PRIOR RESIDENCE.



19. May 31, 2019: SCOTT is shown with a foldable pistol, which he identified as a “Kel-Tec,” equipped with a drum style magazine. This magazine appears similar to the one seized by YPD from the PRIOR RESIDENCE.

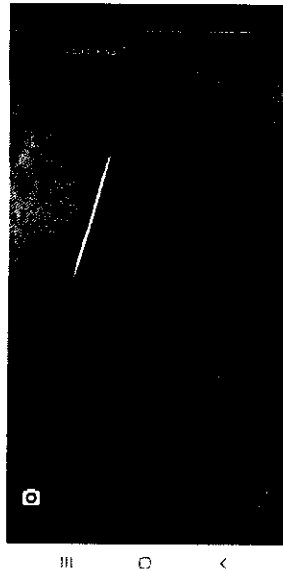


20. July 5, 2019: A Glock pistol case is shown with two firearms and pistol magazines. The case is similar to those seized from the PRIOR RESIDENCE.



21. In late December 2019 and early January 2020, SCOTT released a rap video titled “Knucklehead Pt. 2” that indicated he may be back in the Ypsilanti area.

22. On or about January 4, 2020, SCOTT posted an image on his Instagram page of an extended magazine manufactured by Elite Tactical Systems. This magazine is very similar to those seized from the PRIOR RESIDENCE.



23. On or about January 7, 2020, Deputy Traskos advised me that SCOTT had recently posted several images on Instagram. From those images, Deputy Traskos identified the Villas as an apartment complex where SCOTT might be living. The leasing office provided Deputy Traskos with a copy of a Lease Modification Agreement

associated with 2881 Bynan Drive, Apartment 307, Ypsilanti, Michigan (SUBJECT RESIDENCE) signed by SCOTT's mother on January 2, 2020 and valid through August 9, 2020.

24. On January 7, 2020, at about 3:30 p.m., while conducting surveillance, I saw SCOTT exit the building where the SUBJECT RESIDENCE is located carrying a puppy. SCOTT placed the puppy in a silver Cadillac sedan with Michigan plate number 40 D 413, got into the driver's seat, and drove out of the complex.

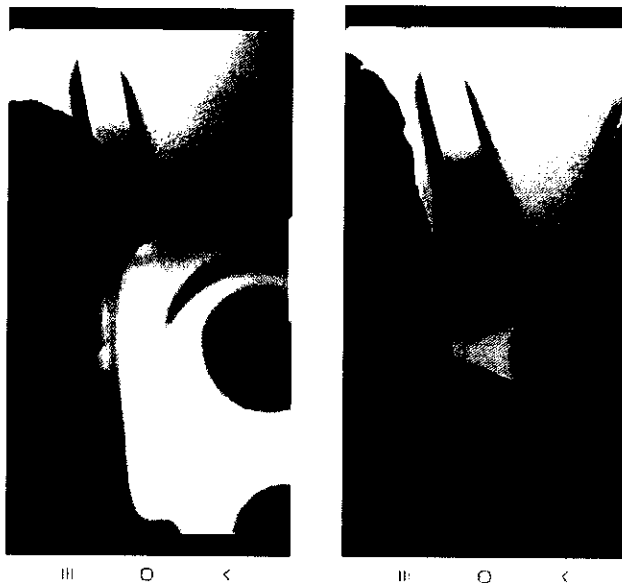
25. On January 9, 2020, at about 12:32 p.m., the same Cadillac arrived and parked in the first parking space in front of the building of the SUBJECT RESIDENCE. No one exited from the vehicle. At about 12:37 p.m., two subjects approached the Cadillac on foot. One was a young black male with mid-length braided hair; he got into the front passenger seat. The other was also black and may have been female; that subject approached the driver's side window, appeared to lean into the vehicle momentarily, and then entered the building of the SUBJECT RESIDENCE.

26. A short time later, that subject exited the building and appeared to get into the rear driver's side seat of the Cadillac.

Approximately one to two minutes later, the black male got out of the front passenger seat of the Cadillac and got into the driver's seat of a small red or maroon Nissan. The other subject appeared to exit the back seat of the Cadillac, but it is unclear where that subject went. The Nissan and Cadillac exited the complex. As the Cadillac turned south out of the complex, I could see that SCOTT was the driver.

27. Later that afternoon, the Cadillac returned and parked in the parking lot of the building of the SUBJECT RESIDENCE. I saw SCOTT exit the Cadillac with a toddler. Both SCOTT and the child carried plastic grocery bags into the building.

28. On January 13, 2020, SCOTT posted several images of himself to Instagram, two of which show him in possession of a handgun.



29. On January 21, 2020, a federal search warrant was executed at the SUBJECT RESIDENCE, which SCOTT was occupying at the time, and the following items, among others, were seized: a Remington, model 870, 12-guage shotgun; a Smith & Wesson, model SD9 VE, 9mm pistol, packaged marijuana; a digital scale; and over \$6,000 in U.S. currency.

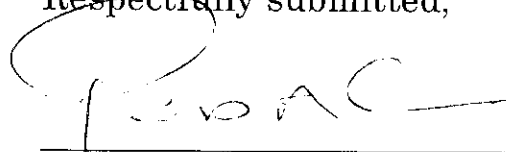
30. ATF Special Agent Michael Bolf, who was present for the search warrant, examined the firearms and determined that both were manufactured outside of Michigan and thus had traveled in and affected interstate commerce.

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III. CONCLUSION

31. For these reasons, probable cause exists to believe that SCOTT, a convicted felon, did knowingly and intentionally possess a firearm that traveled in and affected interstate commerce, in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,



Ted A. Crews, Special Agent
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to and subscribed before me and
signed in my presence.



HON. ELIZABETH A. STAFFORD
UNITED STATES MAGISTRATE JUDGE

Date: JAN 21 2020